

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Renewal Title V / Synthetic Minor, Operating

Permit: V-07-025

Renaissance Mark

Bowling Green, KY 42101

July 7, 2007

Frough Sherwani, Reviewer

SOURCE ID: 21-227-00097

AGENCY INTEREST: 4125

ACTIVITY: APE20040002

**SOURCE DESCRIPTION:**

On September 11, 2003, the Division received an application from Renaissance Mark for the renewal of their permit V-98-034 (Revision 1) to operate a printing presses facility in Bowling Green, Kentucky. The plant consists of the following operational areas

- a. Lithographic Department
- b. Flexographic Department
- c. Finishing Department
- d. Maintenance/Ancillary Plant Operations

**Permit V-98-044**, was issued on March 10, 1999 with an allowable of 240.0 tons of VOC per year. The permit expired on March 10, 2004.

Due to the removal of some of the emission points source wide VOC emissions potential to emit (PTE) is 200.00 tons per year. Therefore 240.00 tons per year limit has been removed from the renewed permit V-07-025

The Division issued a revision for permit # V-98-044 for the following changes.

**Log # 51039**, To construct/operate the addition of one (1) Mitsubishi lithographic press (EP 17) and one (1) Comeco flexographic press (EP18). In addition, the source also removed a Roland lithographic press (EP 13) and two (2) Webtron flexographic presses [EP 05 (FLX-003) and EP 05 (FLX-004)]. The VOC allowable of 240 tons per year stayed the same.

The source has submitted the following applications for the removal and the addition in the facility.

**Log # 53956**, application received on July 03, 2001

Two Heidelberg lithographic presses are removed, one same press added, one man Roland 52" lithographic press is replaced by one Komori 40" lithographic press.

**Log # 53956 (additional Info.)**, application received January 29, 2002

One Heidelberg lithographic press is removed, one of same is added and One Komori press is removed.

**Log # 55403**, application received January 29, 2002  
Name change from Mail-well Label USA, Inc. to Renaissance Mark

**Log # 55469**, application received January 21, 2003  
Two Comco 22", 11-Stage flexographic presses are added.

**Log # 55591**, application received March 14, 2003  
Three Comco 18 flexographic presses are added

**Log # 55726**, application received May 07, 2003  
One lithographic press is added.

**Log # 55977**, application received September 10, 2003  
Two Heidelberg lithographic and one Comco 18" presses are added.

**Renewal of Title V (Log # 55980)** -The permittee has applied for the renewal of their Title V (V-98-044) permit on Sep. 11, 2003.

**Log # 56168**, application received November 25, 2003  
One Mitsubishi lithographic press is added.

May 4, 2006 Division received an application from the source for the addition of a "paper trim system with Cyclone and baghouse".

All applications listed above have been incorporated into the renewal permit V-07-025.

**COMMENTS:**

1. Type of control and efficiency:

None of the significant emission points are equipped with control device.

2. Emission factors and their source:

- a. Emissions of VOCs and HAPs from each type of type of ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, or any other volatile material used were based on the formulation sheet (MSDS) of each material.
- b. In the calculation of the emission from the lithographic presses (non heat set), it is assumed from the control technique guidelines (CTG) that 95% of the ink retained with the web.

3. Applicable regulations:

- a. 401 KAR 59:010, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975)
- b. Regulation 401 KAR 59:212, New graphics arts facilities using rotogravure and flexography, applies to each flexographic press at the facility. However, the facility is exempt from the VOC standards under Section 3 since the permittee has elected to comply with the exemptions under Section 6 of this regulation. Pursuant to this exemption, the permittee will only use inks whose volatile portion consists of seventy-five (75) volume percent water and twenty-five (25) volume percent organic solvent (or a lower VOC content) in all flexographic printing units.

4. Precluded Regulations:

40 CFR 63 Subpart KK, National emission standards for the printing and publishing industry does not apply to flexographic printing press, because this is not the major source of HAPS.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.